



# Requirements for Fire Training Exercises Involving Structures

Air Pollution Control Program fact sheet

9/2005

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## Introduction

This fact sheet addresses the Missouri Department of Natural Resources' regulatory requirements for fire training exercises to be conducted by fire protection agencies on standing buildings or structures. The department recognizes that these exercises, when conducted in a planned manner, provide an invaluable training tool for fire protection personnel. This bulletin addresses only those requirements that are the regulatory responsibility of the department.

Two department programs administer and enforce statutes and regulations that affect fire training exercises. These are the Air Pollution Control Program (APCP) and the Solid Waste Management Program (SWMP). Other agencies such as the U.S. Environmental Protection Agency (EPA) and National Fire Protection Association (NFPA) also have requirements or guidelines related to fire training.

## Air Pollution Control Program Requirements

Fires set for the purpose of training and instructing fire protection personnel in the methods of fighting fires are presently exempt from Missouri's open burning regulations. This exemption does not apply if the exercise does not conform to the limitations described in the regulation, causes or constitutes a hazard to vehicular or air traffic or causes a violation of any other state regulation. This exemption is expressly in-tended for fire training exercises only and does not authorize the intentional burning of a structure as a method of demolition or disposal. The burning of demolition debris from a previously demolished structure will not be considered exempt. Also, fire training will not be approved for structurally unsound structures where asbestos containing and petroleum-based materials can not be safely removed. A liability waiver from the owner of the property used in the exercise does not relieve the property owner, fire department or district from responsibility under applicable statutes and regulations.

In addition to the open burning regulations, fire training exercises involving buildings or structures are also regulated under the National Emission Standard for Asbestos, located at 40 CFR Part 61, Subpart M. This federal regulation which is enforced by the department sets forth requirements for asbestos inspection, asbestos removal and notification.

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- **Identifying Asbestos Containing Materials (ACM)**

Prior to using a structure for a fire training exercise, the structure must be thoroughly inspected to determine if any asbestos containing materials are present. In the event that a building is structurally unsound and can not be thoroughly inspected, the structure may not be used for a fire training exercise.

This inspection of the structure must be performed by a Missouri-certified asbestos inspector. The inspector should identify all potential asbestos containing materials that may be present in or on the structure. Samples of the suspect materials should be collected and submitted for laboratory analysis to determine if they contain asbestos. The asbestos inspector can assume materials to be asbestos containing and avoid additional laboratory analysis. However, an inspector cannot determine a suspect material to be non-asbestos containing without laboratory analysis. The inspector should generate a report of his findings from the inspection. The report should indicate all suspect materials that were identified, as well as quantify the amount, location, category and condition of all asbestos containing materials. The report should also include a copy of the analytical results and chain of custody for all samples that were collected.

If you need assistance with finding a Missouri-certified asbestos inspector, you may contact the Air Pollution Control Program or find a list of inspectors on the department's Web site at [www.dnr.mo.gov/alpd/apcp/Asbestos.htm](http://www.dnr.mo.gov/alpd/apcp/Asbestos.htm).

- **Asbestos Removal**

If the asbestos inspection indicates the presence of 160 square feet, 260 linear feet, 35 cubic feet or more of asbestos containing material (threshold amount), then all of the asbestos containing material present must be removed prior to the fire training exercise. Asbestos present in quantities less than the threshold do not have to be removed under the requirements of the NESHAP. However, the department strongly recommends that all asbestos be removed prior to the intentional burning of a structure. If the materials to be removed are identified by the inspector as being friable ACM or nonfriable ACM in poor condition, then a Missouri registered asbestos abatement contractor must be used to remove the materials. Abatement contractors are trained in the proper procedures for safely removing and disposing of asbestos containing material. Abatement contractors are required to employ only individuals who are trained and certified by the department to remove regulated asbestos containing materials on regulated projects.

The act of burning any nonfriable asbestos containing material will render it friable. If the overall project involves more than a threshold amount of Regulated Asbestos Containing Materials (RACM), burning any nonfriable material will subject it to regulation. However, if removed in a manner that does not render the material friable prior to the fire training exercise, the removal of the nonfriable ACM could be performed as an unregulated abatement project. Although unregulated by the department, requirements of the Occupational Safety & Health Administration (OSHA) or the Environmental Protection Agency (EPA) Worker Protection Rule may still apply for work involving nonfriable materials. The department always recommends the use of trained individuals to remove any ACM and compliance with all applicable OSHA and EPA protective standards.

If you need assistance with finding a Missouri registered asbestos abatement contractor, you may contact the Air Pollution Control Program or find a list of contractors on the department's Web site at [www.dnr.mo.gov/alpd/apcp/Asbestos.htm](http://www.dnr.mo.gov/alpd/apcp/Asbestos.htm).

- **Petroleum Product Removal**

All petroleum-based products must be removed prior to the start of any fire training exercise. Petroleum-based products release hazardous air pollutants into the environment when burned. Petroleum-based products include, but are not limited to, items such as asphalt roofing shingles, vinyl siding, vinyl tile, linoleum, carpeting, and ceiling tiles. Provided that these materials do not contain asbestos, no special handling requirements are required for the removal of these materials. However, all demolition waste must be properly disposed of at a permitted landfill or transfer facility.

- **Notification Requirements**

There are two types of notifications that may be required by the department in regard to fire training exercises, asbestos abatement project notification and demolition project notification. Asbestos abatement project notifications must be submitted to the department at least 10 working days prior to the start of a regulated asbestos abatement project. This notification is only required if the structure contains more than a threshold amount of RACM. The second type of notification that is required is demolition notification. Demolition notification must be provided to the department at least 10 working days prior to the start of the fire training exercise. This notice is required for all fire training exercises involving structures, even if there is no asbestos present. A copy of the asbestos inspection report must accompany this notification.

It is the obligation of the owner, the fire department, and any other contractors involved to ensure that these notices are provided to the department. Failure to submit the notification is a violation of the Missouri Air Conservation Law and regulations. The department will issue an approval letter for all asbestos abatement and demolition project notifications. Owners, fire departments, and contractors performing these types of projects should not proceed with the project without this approval.

### **Solid Waste Management Program Requirements**

The Solid Waste Management regulations require that demolition waste or any waste (including ash) that remains after a fire training exercise be properly disposed of at a permitted solid waste facility. Only clean fill may remain onsite or be disposed of in a location other than a permitted solid waste facility. Clean fill is defined as uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblock and brick. Materials may contain only minimal amounts of wood or metal or other inert solids as approved by the department to qualify as clean fill.

### **Additional Information**

The department's Division of Geology and Land Survey (DGLS) requires any wells that will be or are permanently abandoned on a site be properly plugged. A fact sheet on well and cistern abandonment is available from DGLS by calling (573) 368-2165.

## Contact Information

For more information on the fire training requirements discussed in this bulletin, contact the department's Air Pollution Control Program, Solid Waste Management Program, or one of the department's other offices:

Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102  
(573) 751-4817 - phone  
(573) 751-2706 - fax  
[www.dnr.mo.gov/alpd/apcp](http://www.dnr.mo.gov/alpd/apcp)

Missouri Department of Natural Resources  
Solid Waste Management Program  
P.O. Box 176  
Jefferson City, MO 65102  
(573) 751-5401 - phone  
(573) 526-3902 - fax  
[www.dnr.mo.gov/alpd/swmp](http://www.dnr.mo.gov/alpd/swmp)

## Other Department Offices

Kansas City Regional Office	Lee's Summit	(816) 622-7000
Northeast Regional Office	Macon	(660) 385-8000
St. Louis Regional Office	St. Louis	(314) 416-2960
Southeast Regional Office	Poplar Bluff	(573) 840-9750
Southwest Regional Office	Springfield	(417) 891-4300
Environmental Assistance Office	Jefferson City	1-800-361-4827

## Local Agencies

In Missouri, there are also four local agencies that have delegated authority to enforce the department's asbestos requirements. These local agencies may also have more stringent local ordinances that they enforce as well. Prior to performing a fire training exercise in one of the below jurisdictions, you should contact the appropriate local agency to determine if any additional requirements or restrictions apply.

<b>Jurisdiction</b>	<b>Agency</b>	<b>Telephone</b>
Kansas City proper	Kansas City Health Department, Air Quality Section	(816) 513-6314
St. Louis City proper	St. Louis Division of Air Pollution Control	(314) 613-7300
St. Louis County	St. Louis County Health Department	(314) 615-8923
Springfield proper	Springfield-Greene County Health Department	(417) 864-1662

### **Additional Asbestos Related Guidance Documents**

For more specific information on the department's requirements in regard to asbestos, please reference the additional guidance documents listed below or contact the department or appropriate local agency at the contact information listed above.

- *Asbestos: What is it and Why is it a Concern?*
- *Asbestos Requirements for Demolition and Renovation Projects*
- *Management of Nonfriable Asbestos Containing Materials*
- *Natural Disaster Assistance for Missouri Citizens - How to Handle Asbestos Containing Debris*

### **For more information**

Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176, Jefferson City, MO 65102-0176  
1-800-361-4827 or (573) 751-4817 office  
(573) 751-2706 fax  
[www.dnr.mo.gov/alpd/apcp](http://www.dnr.mo.gov/alpd/apcp) Program Home Page